

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b) HELLRING LINDEMAN GOLDSTEIN & SIEGAL LLP Bruce S. Etterman, Esq. Attorneys for Benjamin A. Stanziale, Jr. Chapter 7 Trustee One Gateway Center Newark, New Jersey 07102-5323 973.621.9020 bsetterman@hlgsllaw.com	
In Re:	Case No. 20-19017 (RG)
HEALTH TECH HARBOR, INC.,	Judge: Rosemary Gambardella
Debtor.	Chapter 7
	Hearing Date: August 16, 2022 at 10:00 a.m.

NOTICE OF MOTION FOR AN ORDER
RE STATUS OF GOODWIN PROCTOR LLP CLAIM

TO: ALL PARTIES IN INTEREST LISTED ON THE CERTIFICATION OF
SERVICE AND GOODWIN PROCTOR LLP

SIR OR MADAM:

PLEASE TAKE NOTICE that on August 16, 2022, at 10:00 a.m., or as soon thereafter as counsel may be heard, Benjamin A. Stanziale, Jr., Chapter 7 Trustee (“Trustee”) for Health Tech Harbor, Inc. (“Debtor”), shall move before the Honorable Rosemary Gambardella, United States Bankruptcy Judge, at the United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Courtroom #3-E, Newark, New Jersey 07102, for an Order **that Claim No. 73 on the Court’s Claims Register of Goodwin Proctor LLP listed as a general unsecured claim in the amount of \$599,897.31 is a late filed claim that shall**

receive a distribution only after all other unsecured claims have been fully satisfied, in accordance with 11 U.S.C. § 502(b)(9) and 11 U.S.C. § 726(a)(3).

PLEASE TAKE FURTHER NOTICE that in support of the motion Movant will rely upon the Declaration of Benjamin A. Stanziale, Jr. filed in support of the relief requested.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court in accordance with D.N.J. LBR 9013-4.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that a proposed form of order granting the relief requested herein is submitted herewith and made a part of the motion herein pursuant to D.N.J. LBR 9013-1(a)(4).

HELLRING LINDEMAN GOLDSTEIN & SIEGAL LLP
Attorneys for Benjamin A. Stanziale, Jr., Chapter 7 Trustee

By: /s/ Bruce S. Etterman
BRUCE S. ETTERMAN
A Member of the Firm

Dated: July 13, 2022